



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

Honorable Judge Sylvia H. Rambo  
United States District Judge  
Middle District of Pennsylvania  
228 Walnut Street  
Harrisburg, Pennsylvania 17101  
**VIA ECF**

November 9, 2022

**Re: Thome v. Splain, 20-2167**

Dear Honorable Judge Rambo,

I am writing on behalf of the Parties to request a status conference to discuss a date-certain for trial, and attendant deadlines.

The Parties have completed fact discovery. The Defendants will not be filing a dispositive motion on November 11, 2022.

The Parties are in the midst of exchanging expert reports. The Parties have been working amicably together to resolve the mutual need for extensions of time to produce expert reports. For their part, the Defendants anticipate needing until early January to provide opposition reports. The Parties will then need a brief period of time for supplemental reports and expert discovery.

In light of the fact that the Defendants will not be filing a motion for summary judgment, and that the case will be going to trial, the Parties believe that it will be most efficient for the Court to hold a status conference to discuss a schedule moving forward, before the filing of a motion for extension of deadlines. While some additional time is needed for expert discovery, the Parties wish to have the case go to trial as soon as the Court's schedule allows.

Very truly yours,

/s/ *Nicole J. Boland*

Nicole J. Boland  
Assistant Counsel  
Pennsylvania State Police

cc: Ben Present, Esq.

